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Remarks/Arguments

Claims 40-70 are pending in the application. Of these claims, claims 40-69 have been amended, while claim 70 has been added. Applicant has amended the claims to clarify claim numbering and the claimed subject matter. The subject matter of claims 40, 44-46 and 48 has been incorporated into new claim 70. No new matter has been added to the prosecution of this application. For at least the reasons stated below, Applicant asserts that all claims are now in condition for allowance.

1. Claim Objections

The claims were objected to for improper numbering. Applicant asserts that this objection is moot in light of the claim amendments above. Accordingly, Applicant requests withdrawal of the objection to claims 40-69.

2. 35 U.S.C. § 112 Rejections

Claim 40 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicant asserts that the rejection of claim 40 is moot in light of the claim amendments above. Accordingly, Applicant asserts that any indefiniteness has been removed from the claim, requests withdrawal of the rejection.

3. 35 U.S.C. 103 Rejections

Claims 40, 43-49, 51-53, 56-59, 63-64 and 68-69 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, U.S. Patent No. 6,205,482 in view of PR Newswire.

Claim 41 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, U.S. Patent No. 6,205,482, and PR Newswire, as applied to Claim 40, further in view of Official Notice (regarding profile information hereafter referred to as "ONI").

Claims 42 and 50 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, U.S. Patent No. 6,205,482, and PR Newswire, as applied to claim 46, further in view of *Johnson* and Official Notice.

Claims 54-55 and 62 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, U.S. Patent No. 6,205,482, and PR Newswire, as applied to claim 40, further in view of *Proctor*.

Claims 60-61 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, and PR Newswire, as applied to claim 40, further in view of the PR Newswire.

Claims 65-67 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Navarre et al.*, and PR Newswire, as applied to claim 64, further in view of Official Notice.

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Applicant opposes these 103(a) rejections. The outstanding Office Action recites that *Navarre* fails to disclose all of the limitations of Applicant's claims. See page 5 of the Office Action. In the Office Action, *Navarre* was combined with other references (*Johnson*, *Proctor*, and various *PR Newswire* disclosures) to form 103(a) rejections. Accordingly, it is clear that *Navarre* fails to disclose, expressly or inherently, nor suggest all the limitations of Applicant's invention as claimed.

As to claims 40, 43-49, 51-53, 56-59, 63-64 and 68-69, Applicant asserts that the combination of *Navarre* with *PR Newswire* is an improper rejection. Applicant does not concede that *Navarre* discloses the limitations asserted in the rejection of claims 40, 43-49, 51-53, 56-59, 63-64 and 68-69. However, even if *Navarre* did disclose the limitations as asserted in the outstanding Office Action, the combination of *Navarre* with the *PR Newswire* teaching of secure email filing of IRS tax returns fails to form a proper rejection of the claims. There is no disclosure or suggestion of security and authentication in *Navarre* through the use of encryption and digital certificates, as claimed by Applicant. The absence of enabling disclosure of security and authentication in *Navarre* demonstrates the lack of motivation to combine the teachings *PR Newswire* with *Navarre*. Additionally, *PR Newswire* fails to disclose or suggest the use of digital certificates in a business-to-government system which allows a user to communicate with a plurality of government agencies via a single portal, as claims by Applicant. Accordingly, there is no motivation in either *Navarre* or *PR Newswire* to combine these references to form Applicant's invention as claimed.

Furthermore, the combination of *Navarre* and *PR Newswire* fails to disclose or suggest the user having the ability to customize the interface to allow a user to determine which government agencies that they want to communication with, as claimed by Applicant. *Navarre* discloses communication with different entities (examples provided with government applications), however, the communication is disclosed as more of a broadcast communication. *Navarre* discloses a user accessing the system to retrieve information. Specifically, when a user requests information, all applications that are in communication with the interface are accessed; no selection of available applications takes place. And whichever applications have the requested information, reply to the request with the results. There is no disclosure or suggestion of the ability to choose or customize the interface to determine which applications (in Applicant's context, government agencies) the user desires to access. In other words, *Navarre* and *PR Newswire* fail to disclose or suggest customization of the interface.

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Moreover, Applicant's patent application was filed prior to the issue date of *Navarre* (3/30/2001). Accordingly, Applicant asserts that it is clear that *Navarre* was not disclosed or available to the public. It logically follows that if *Navarre* was not publicly known, its subject matter could not be obvious to one of ordinary skill in the art at the time Applicant's invention was made (at least as early as 2/26/1999) to combine unknown teachings of *Navarre* with published *PR Newswire*. It appears that the Examiner is using hindsight to combine the two references to formulate an obviousness rejection. The requirement for a proper 35 U.S.C. 103(a) rejection is "...the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art..." Applicant asserts that it is not the case in the rejection of these claims. The gateway disclosure of *Navarre* was not known by the public at the time Applicant's invention was filed.

Accordingly, for at least the above reasons, Applicant asserts that the rejection of claims 40, 43-49, 51-53, 56-59, 63-64 and 68-69 is improper, and requests withdrawal of the 103(a) rejection.

As to dependent claims 41, 42, 50, 54, 55, 60-62 and 65-67, Applicant asserts that the various combinations of *Navarre* with the teachings of *PR Newswire* publications, Official Notices, *Johnson* and *Proctor* fail to disclose or suggest all of the limitations of Applicant's claims, for the same reasons provided in the remarks to the rejection above. *Navarre* and *PR Newswire* fail to disclose all the limitations of the claims, and the modification of that disclosure with the teachings of *PR Newswire* publications, Official Notices, *Johnson* and *Proctor* does not remedy the deficiencies of *Navarre* and *PR Newswire*.

Accordingly, Applicant asserts that *Navarre*, the *PR Newswire* publications, *Johnson* and *Proctor*, each alone or in combination, fail to disclose or suggest all of the limitations of claims 41, 42, 50, 54, 55, 60-62 and 65-67. Thus, Applicant asserts that the rejections are improper, and request withdrawal of the 103(a) rejections.

4. Conclusion

Applicant submits that for at least the above-identified reasons, all pending claims are allowable over the art of record and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7278. If any fees

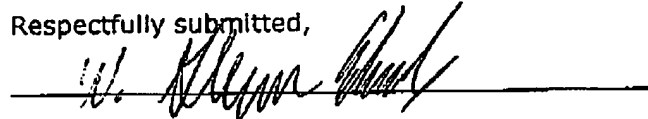
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are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Docket 60021-305107).

Respectfully submitted,



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